



# Indiana Department of Education

SUPPORTING STUDENT SUCCESS

Office of Title I Academic Support – 151 West Ohio Street – Indianapolis, IN 46204

April 21, 2008

Dr. Bruce Stahly, Superintendent  
Goshen Community Schools #2315  
613 Purl Street  
Goshen, Indiana 46526-4044

Dear Dr. Stahly:

On March 10, 2008, the Indiana Department of Education's (IDOE) Title I monitoring team commenced an on-site monitoring review of Goshen Community Schools' administration of Title I, Part A of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the *No Child Left Behind Act* (NCLB). Enclosed is a report based upon this review.

Prior to, during, and following the on-site monitoring review, the IDOE team conducted a number of activities (described in the attached report) to verify compliance with 1) the programmatic requirements of Title I, Part A; and 2) the fiscal requirements that must be followed by recipients of Title I, Part A educational funds.

The enclosed report summarizes the results of our on-site monitoring review. **Within 30 business days of the date of this letter**, please submit a response, and where appropriate, further documentation. IDOE will review the documentation and determine if it is sufficient to remove or remedy identified compliance problems.

In all cases where there are findings of non-compliance, **Goshen Community Schools is responsible for taking appropriate action to remedy compliance deficiencies.** In some instances this can occur immediately and in some instances a longer term solution may be necessary. Where longer-term measures are necessary, Goshen Community Schools must submit a specific detailed action plan with timelines and benchmarks for corrective action. IDOE will be happy to provide technical assistance as appropriate.

The IDOE team would like to thank your staff for their work and assistance provided prior to and during the review in gathering materials and providing access to information in a timely manner.

We look forward to continued cooperation in working with you and your staff members on any follow-up activities and in assisting Goshen Community Schools to improve the delivery of Title I services.

Sincerely,

Lee Ann Kwiatkowski, Director  
Office of Title I Academic Support  
Indiana Department of Education

cc: Mrs. Carol Rhudy, Title I Program Administrator  
Goshen Community Schools #2315

Ms. Linda Miller, Assistant Superintendent  
Center for School and Student Academic Support  
Indiana Department of Education

**Indiana Department of Education  
Title I, Part A Monitoring**

**District: Goshen Community Schools**

**Monitoring Date:** March 10, 2008

**Monitoring Team:** Cindy Hurst, Teresa Neely, Lenee Reedus, Linda Ricketts, Brenda Martz, and Sarah Pies

**Background Information**

The Indiana Department of Education (IDOE) commenced on-site monitoring of Goshen Community Schools on March 10, 2008. The purpose of this monitoring visit was to identify areas of strength, areas that need improvement, and areas of non-compliance with Title I, Part A and federal grants management (fiscal) requirements.

IDOE specifically monitored in the following areas:

| Monitoring Topic  | Statutory Citation   |
|---|--|
| 1) Compliance with professional qualification requirements for teachers and paraprofessionals | NCLB §1111(h)(6)(A)<br>NCLB §1119(c)(1)<br>NCLB §9101(23)  |
| 2) Compliance with parental involvement requirements  | NCLB §1118(a)-(h)<br>NCLB §1111(c)(14)<br>NCLB §1111(d)<br>NCLB §1116(a)(1)(D)<br>NCLB §9101(23) |
| 3) Compliance with school improvement requirements  | NCLB §1116(b)(1)(B)<br>NCLB §1116(b)(3)<br>NCLB §1116(c)<br>NCLB §1116(e)                        |
| 4) Compliance with LEA improvement requirements   | NCLB §1116(c)(7)   |
| 5) Compliance with schoolwide program requirements  | NCLB §1114   |
| 6) Compliance with targeted assistance program requirements                                   | NCLB §1115   |
| 7) Compliance with school ranking and serving requirements                                    | NCLB §1113   |
| 8) Compliance with comparability requirement  | NCLB §1120A  |
| 9) Compliance with maintenance of effort requirement  | NCLB §1120A<br>NCLB §9521  |
| 10) Compliance with equitable services to private school students requirements                | NCLB §1120   |

|  |   |
|--|---|
| 11) Compliance with statutory set-aside requirements                 | NCLB §1113<br>NCLB §1116<br>NCLB §1118        |
| 12) Compliance with supplement, not supplant requirements            | NCLB §1120A                                   |
| 13) Compliance with financial management/procurement requirements    | EDGAR §80.20<br>EDGAR §80.36                  |
| 14) Compliance with compensation for personnel services requirements | OMB Circular A-87, Attachment B, Section 8    |
| 15) Compliance with complaint procedures                             | Subpart F—Complaint Procedure (CFR, Title 34) |
| 16) Compliance with equipment and technology requirements            | EDGAR §80.32<br>OMB Circular A-87             |
| 17) Compliance with Neglected Institutes                             | NCLB §1401                                    |

During the on-site visit, IDOE spent time interviewing staff from Goshen Community Schools at their central office. In addition, IDOE visited two schools, Chamberlain Elementary and Chandler Elementary, where interviews were conducted with the principals and the Title I staff.

IDOE also reviewed documents from Goshen Community Schools, including district policies and procedures, district notices to parents, district plans, school plans, personnel information, budget documents, contracts, and expenditure reports.

Based on the above information, our report follows.

## **Monitoring Topic 1: Compliance with NCLB Professional Qualification Requirements for Teachers and Paraprofessionals**

### **Background**

IDOE interviewed the Title I Program Administrator, the Assistant Superintendent, and two Title I building principals regarding professional qualification requirements. In addition, IDOE reviewed central office and school documentation.

*Statutory Requirement: Professional qualifications requirements are contained in Sections 1111 and 1119 of Title I. In addition, “highly qualified” is defined in Section 9101(23) of the general provisions section of NCLB.*

### **Area of Strength:**

**Professional Qualification Requirements:** Goshen Community Schools provided evidence that all core academic teachers and instructional paraprofessionals meet the highly qualified requirements, based on a random sampling of teachers and paraprofessionals from Title I schools. Documentation, including teacher licenses and HOUSSE documentation, is kept on file at the central office.

### **Areas of Compliance**

**5% Set-Aside:** Goshen Community Schools did not reserve 5% of its allocation in 2007-2008 to support assisting teachers in reaching the professional qualification requirements. All teachers in Title I schools are highly qualified, based on a random sampling of teachers and paraprofessionals from Title I schools.

**Parents’ Right to Know Regarding Non-highly Qualified Teacher:** Goshen Community Schools did not have any students taught by a teacher for four or more consecutive weeks who was not highly qualified.

**Principal Attestation:** Goshen Community Schools ensured that the principal of every school receiving Title I funds attests annually, in writing, as to whether the school is in compliance with the professional qualification requirements of NCLB. As part of the annual Title I application review, grant approval is not given unless each principal has signed the grant attesting that their school is compliant with the professional qualification requirements of NCLB.

### **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 1**

**Paraprofessionals:** Goshen Community Schools did not provide evidence that instructional paraprofessionals (i.e., Instructors), work under the direct supervision of a highly qualified teacher.

**Required Action:** Goshen Community Schools must ensure that all Title I Instructors are working under the direct supervision of a highly qualified teacher. That means the teacher plans the instructional support activities for the paraprofessional to carry out, evaluates the achievement of the students with whom the paraprofessional is working, and that the paraprofessional works in close and frequent proximity to the teacher.

**Parents' Right to Know Regarding Request for Teacher Qualifications:** Goshen Community Schools did not provide evidence that the Parents' Right to Know letter was distributed to all students in Title I buildings.

**Required Action:** Goshen Community Schools must ensure that the Parents' Right to Know letter is distributed to all students in Title I buildings, through either a mailing or other systematic method, so that documentation can be provided.

The letter must be distributed to parents for school year 2008-2009. Evidence of distribution must be submitted to IDOE by September 1, 2008.

## **Monitoring Topic 2: Compliance with Parental Involvement Requirements**

### **Background**

IDOE interviewed the Title I Program Administrator, the Assistant Superintendent, and two Title I building principals regarding parental involvement requirements. In addition, IDOE reviewed policies, compacts, and other documentation provided prior to and during the on-site visit.

*Statutory Requirement: Parental involvement requirements are contained throughout Title I, specifically in Sections 1111, 1116, and 1118. In addition, parental involvement is defined in Section 9101(23) of the general provisions section of NCLB.*

### **Areas of Compliance**

**Annual Meeting:** Goshen Community Schools showed evidence that both Title I schools held an annual meeting for Title I parents during fall 2007. Agendas, sign-in sheets, and meeting PowerPoint presentation were available for review.

**Parent Information Resource Center (PIRC):** Goshen Community Schools showed evidence of PIRC information being included in recent newsletters at both Title I schools.

**Building Schools' and Parents' Capacity for Strong Parental Involvement:** Goshen Community Schools showed evidence of building capacity with its Title I parents that matched activities listed in the approved 2007-2008 Title I application.

## **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 2**

**LEA Parental Involvement Policy:** Goshen Community Schools did not provide evidence of a district parental involvement policy that included all statutory components (Attachment A). The policy was not developed or revised with parental input, as required in NCLB, nor was there evidence of distribution to parents.

**Required Action:** Goshen Community Schools must ensure that it annually revises its LEA Parental Involvement Policy. Title I parents must be included in the development or revision of the policy. Documentation of such meetings must be kept. The LEA policy must be distributed, through either a mailing or other systematic method, so that documentation can be provided.

Evidence of revision to the policy for school year 2008-2009, with Title I parental input, must be provided to IDOE within 30 business days of the date of this letter.

**School Parental Involvement Policy:** Goshen Community Schools did not show evidence of parental involvement policies for Chamberlain Elementary or Chandler Elementary that included all statutory components (Attachments B1 and B2). Policies must be developed or revised with Title I parental input and distributed to parents.

**Required Action:** Goshen Community Schools must ensure that both Title I schools develop and annually revise their School Parental Involvement Policies and that all statutory components are included in the policies. Title I parents must be included in the development or revision of those policies. Documentation of such meetings must be kept. School policies must be distributed to parents, through either a mailing or other systematic method, so that documentation can be provided.

Updated policies and evidence of the revision of the policies with Title I parental input for the 2008-2009 school year must be provided to IDOE within 30 business days of the date of this letter.

**School-Parent Compact:** Goshen Community Schools did not provide evidence of school-parent compacts for either Chamberlain Elementary or Chandler Elementary that included all statutory components (Attachments C1 and C2). Additionally, there was no involvement of parents with the development/revision or evidence of distribution.

**Required Action:** Goshen Community Schools must ensure that Title I schools annually revise their School-Parent Compacts and that all statutory components are included in the compacts. Title I parents must be included in the development or revision. Documentation of such meetings must be kept. School-parent compacts must be distributed to parents, through either a mailing or a systematic method, so that documentation can be provided.

Updated compacts and evidence of the revision to the policies with Title I parental input for the 2008-2009 school year must be provided to IDOE within 30 business days of this letter.

**Reviews Effectiveness of Parental Involvement Activities:** Goshen Community Schools annually surveys parents via phone calls. The surveys do not specifically measure Title I parental involvement activities or their effectiveness.

**Required Action:** Goshen Community Schools must develop an evaluation for the effectiveness of the parental involvement activities for the 2008-2009 school year, which may include surveys for parents to complete at the conclusion of a Title I activity.

**Monitoring Topic 3:**  
**Compliance with school improvement, corrective action, restructuring, and alternative governance requirements; including proper implementation of public school Choice and Supplemental Educational Services.**

**Background**

IDOE interviewed the Title I Program Administrator, the Assistant Superintendent, and two Title I building principals regarding school improvement issues. Both Title I served schools visited, Chamberlain Elementary and Chandler Elementary, are identified for school improvement for the 2007-2008 school year.

*Statutory Requirement: School improvement, corrective action, restructuring, and alternative governance requirements, including proper implementation of public school choice and supplemental educational services are contained in Section 1116. Depending on the number of years a school has not made adequate yearly progress (AYP), the school, district, and in certain cases state, must take certain actions.*

**Areas of Compliance**

**Public School Choice:** Goshen Community Schools was able to provide evidence that it implemented Public School Choice. Records were kept indicating parents' choices and transfers granted.

**Technical Assistance:** Goshen Community Schools provided evidence that Title I principals and central office staff meet regularly to plan and discuss current Title I programs. Additionally, two Title I schools are participating in schoolwide planning during the 2007-2008 school year.



### **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 3**

**Notification to Parents:** Goshen Community Schools did not provide evidence that school improvement letters were approved by IDOE prior to being distributed to parents. Additionally, the letters reflected school choices that were not viable options for transfer.

**Required Action:** Goshen Community Schools must ensure that school improvement letters are approved by IDOE prior to distribution to parents. Sample templates have been developed and are available on the IDOE Title I website, [http://www.doe.state.in.us/TitleI/monitoring\\_resources.html](http://www.doe.state.in.us/TitleI/monitoring_resources.html). Letters must be submitted to IDOE in both English and Spanish by May 16, 2008.

Additionally, Goshen Community Schools must ensure that documentation of distribution of school improvement letters is kept for school year 2008-2009. School improvement letters can be distributed through either a mailing or other systematic method, so that documentation can be provided.

**Supplemental Educational Services (SES):** Goshen Community Schools did not provide evidence of compliant implementation of SES. The LEA did not begin services until January 2008, several months after identification.

Additionally, the Per Pupil Expenditure for SES is not based on the final Title I allocation for school year 2007-2008. The Per Pupil Expenditure was mailed to the LEA on July 12, 2007 and is available on the Title I website at [http://www.doe.state.in.us/TitleI/docs/supplemental\\_expenditures.xls](http://www.doe.state.in.us/TitleI/docs/supplemental_expenditures.xls).

**Required Actions:** Goshen Community Schools must ensure that SES will begin early in Fall 2008. The LEA must submit a timeline of SES implementation for the 2008-2009 school year to IDOE within 30 business days of the date of this letter.

Current agreements and contracts must be amended to reflect the actual Per Pupil Expenditure of \$1,115.98. Revised agreements and contracts must be submitted to IDOE within 30 business days of the date of this letter.

**School Improvement Plans:** Goshen Community Schools did not provide evidence that Title I schools had current school improvement plans that contained all statutory components (Attachments D1 & D2), nor were plans revised with parents.

**Required Action:** Goshen Community Schools must ensure that school improvement plans are revised for the 2008-2009 school year with all statutory components and in consultation with Title I parents. Revised plans must be submitted to IDOE by July 1, 2008.

**Peer Review of School Improvement Plans:** Goshen Community Schools did not provide evidence of a peer review process for NCLB school improvement plans for Title I schools identified for improvement. (NCLB 1116(b)(3)(E)(ii) states, “...*within 45 days of receiving a school plan, the LEA shall promptly review the school plan...*”).

**Required Action:** Goshen Community Schools must ensure that a peer review process is completed for NCLB school improvement plans for 2008-2009. Evidence of the peer review, such as compiled comments from reviewers, must be submitted to IDOE by September 1, 2008.

### **Other Matters for Monitoring Topic 3**

**LEA Oversight of School Improvement Requirements:** Goshen Community Schools did not provide evidence that school improvement requirements (e.g., the plan and peer review) were implemented with and monitored by the LEA. For instance, there was no oversight regarding the process by which parents would be notified of their school’s improvement status (see Notification to Parents above).

**Recommendation:** IDOE recommends appointing one central office staff member to oversee school improvement requirements and provide specific guidance and oversight to schools regarding the development, implementation, and evaluation of school improvement plans and requirements.

## **Monitoring Topic 4: Compliance with District Improvement Requirements**

### **Background**

Goshen Community Schools is not identified for LEA improvement during the 2007-2008 school year.

## **Monitoring Topic 5: Compliance with Schoolwide Program Requirements**

### **Background**

Goshen Community Schools has two Title I schools participating in schoolwide planning during the 2007-2008 school year.

## **Monitoring Topic 6: Compliance with Targeted Assistance Program Requirements**

### **Background**

IDOE interviewed the Title I Program Administrator, the Assistant Superintendent, and two Title I building principals regarding Targeted Assistance Programs.

*Statutory Requirement: The targeted assistance program requirements are contained in Section 1115. In a targeted assistance school, a school must maintain a list of eligible children who receive Title I services. Eligible children are children identified by the school as failing, or most at risk of failing, to meet the State's challenging student academic achievement standards.*

### **Area of Compliance**

**Coordination with Regular Educational Program:** Goshen Community Schools demonstrated that the Title I program coordinates with the regular education program. Title I staff have fixed daily schedules and are in classrooms on a regular basis.

Additionally, Goshen Community Schools have Professional Learning Communities for all teachers in Title I buildings. This time allows teachers to collaborate, study, and share strategies that affect classroom instruction.

### **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 6**

**Student Selection:** Goshen Community Schools did not provide evidence that a student selection process is done accurately for each grade level served by Title I. Additionally, there is no formal process in place for move-in students to be assessed and ranked for Title I services.

**Required Action:** Goshen Community Schools must ensure that students are ranked and served according to NCLB guidelines for school year 2008-2009.

The LEA must also ensure that move-in students will be appropriately assessed and ranked to ensure that students most at-risk are identified and provided services as appropriate.

The following resources for student selection are available:

- ❑ PowerPoint Presentation:  
[http://www.doe.in.gov/TitleI/docs/student\\_selection.ppt](http://www.doe.in.gov/TitleI/docs/student_selection.ppt)
- ❑ Sample Student Selection Worksheet  
[http://www.doe.in.gov/TitleI/docs/sample\\_student\\_selection-example.doc](http://www.doe.in.gov/TitleI/docs/sample_student_selection-example.doc)

- ❑ Student Selection Worksheet  
[http://www.doe.in.gov/TitleI/docs/sample\\_student\\_selection.doc](http://www.doe.in.gov/TitleI/docs/sample_student_selection.doc)

**Progress Monitoring and Evaluation of Program:** Goshen Community Schools did not provide evidence that the progress of Title I students is assessed regularly or that the results of that monitoring are used to evaluate the effectiveness of the Title I program.

**Required Action:** Goshen Community Schools must regularly assess the progress of Title I students. The results of that monitoring (and other appropriate assessments) should be used to evaluate the effectiveness of the Title I program. The LEA may use local assessments as part of the evaluation process. Progress monitoring should occur at least twice during the school year and the program evaluation must occur annually.

The LEA must provide an explanation of how progress monitoring will be implemented for the 2008-2009 school year. An evaluation of the 2007-2008 school year program must be submitted to IDOE by June 1, 2008.

## **Monitoring Topic 7: Compliance with School Ranking and Serving Requirements**

### **Background**

IDOE interviewed the Title I Program Administrator and the Assistant Superintendent regarding the Title I ranking and serving requirements.

*Statutory Requirement: The ranking and serving requirements are contained in Section 1113.*

### **Area of Compliance**

**Ranking and Serving:** Goshen Community Schools demonstrated compliance with the statutory requirements for ranking and serving schools within the LEA.

### **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 7**

None.

## **Monitoring Topic 8: Compliance with Comparability Requirement**

### **Background**

IDOE interviewed the Title I Program Administrator and the Assistant Superintendent regarding the Title I comparability requirement.

*Statutory Requirement: The comparability requirement is contained in Section 1120A.*

### **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 8**

**Comparability Report:** Goshen Community Schools provided evidence that a comparability report was completed for the current school year. The report showed that Title I schools are comparable to non-Title I schools in the district.

**Recommendation:** IDOE recommends that Goshen Community Schools keep a comparability file for all schools reported for comparability. That file should include teacher rosters and enrollment data. This will provide documentation that appropriate staff members are counted accurately and enrollment data are correct.

## **Monitoring Topic 9: Compliance with Maintenance of Effort**

### **Background**

The Indiana Department of Education conducts yearly review of maintenance of effort for all Title I schools.

*Statutory Requirement: The maintenance of effort requirements are contained in Section 1120A of Title I and Section 9521 of the general provisions section of NCLB.*

### **Area of Compliance**

Goshen Community Schools met compliance with the maintenance of effort requirement in 2006-2007.

### **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 9**

None.

## **Monitoring Topic 10: Compliance with Equitable Services to Private School Students Requirements**

### **Background**

IDOE interviewed the Title I Program Administrator and the Assistant Superintendent regarding services to nonpublic school students. A phone interview was conducted with a nonpublic school official on April 2, 2008.

*Statutory Requirements: The equitable services requirements are contained in Section 1120.*

### **Area of Compliance**

**Equitable Services:** Goshen Community Schools provided evidence of equitable services to the nonpublic school. The LEA was required to reserve 1% of its funds for parental involvement activities. A proportional share of those funds was used for participating nonpublic school students and their parents.

### **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 10**

**Eligible Students:** Goshen Community Schools did not provide evidence that participating nonpublic school students are residents of an eligible public school attendance area.

**Required Action:** Goshen Community Schools must ensure that a process is developed and implemented for school year 2008-2009. This process must identify residentially eligible nonpublic school students. An explanation of this process must be provided to IDOE within 30 business days of the date of this letter.

**Student Selection:** Goshen Community Schools did not provide evidence that student selection was done appropriately.

**Required Action:** Goshen Community Schools must ensure that student selection of residentially eligible students is done accurately for school year 2008-2009. An explanation of the student selection process must be provided to IDOE within 30 business days of the date of this letter.

**Administration of Nonpublic Program:** Goshen Community Schools did not provide evidence that it maintains control of the Title I program at the nonpublic school.

**Required Action:** Goshen Community Schools must ensure that administration of the nonpublic program is maintained by the LEA. This includes ensuring

residential eligibility of nonpublic school students, determining what instructional services will be delivered, approving and purchasing all materials to support the program, and consultation.

**Progress Monitoring and Evaluation of Program:** Goshen Community Schools did not provide evidence that the progress of Title I served nonpublic students is assessed regularly or that the results of that monitoring are used to evaluate the effectiveness of the Title I program.

**Required Action:** Goshen Community Schools must regularly assess the progress of Title I nonpublic students. The results of that monitoring (and other appropriate assessments) should be used to evaluate the effectiveness of the Title I program. Progress monitoring should occur at least twice during the school year and the program evaluation must occur annually.

The LEA must provide an explanation of how progress monitoring will be implemented for the 2008-2009 school year. An evaluation of the 2007-2008 school year program must be submitted to IDOE by June 1, 2008.

**Consultation with Nonpublic Officials:** Goshen Community Schools provided evidence that consultation took place between the district and nonpublic school officials; however, consultation was done mostly through mail or email correspondence and did not occur regularly during the school year.

**Required Action:** Goshen Community Schools must ensure that consultation with nonpublic officials will include face-to-face contact at least one time during the school year. In addition, ongoing consultation must be planned and implemented by the LEA for the 2008-2009 school year.

The LEA must provide a timeline of consultation for the 2008-2009 school year to IDOE within 30 business days of the date of this letter.

**Recommendation:** IDOE recommends reviewing the following PowerPoint presentation on serving nonpublic school students:

[http://www.doe.state.in.us/TitleI/bulletin/2008-02/nonpublic\\_presentation.ppt](http://www.doe.state.in.us/TitleI/bulletin/2008-02/nonpublic_presentation.ppt).

## **Monitoring Topic 11: Compliance with Statutory Set-aside**

### **Background**

IDOE interviewed the Title I Program Administrator, the Assistant Superintendent, and the Treasurer regarding the Title I statutory set-aside requirements. Fiscal documents were reviewed prior to and during the onsite visit.

*Statutory Requirements: The statutory set-aside requirements are contained throughout Title I, including required reservations for neglected and delinquent children; homeless children, public school choice, supplemental educational services, school improvement, parental involvement and professional development (see Sections 1113, 1116, and 1118).*

### **Areas of Compliance**

**Homeless students:** Goshen Community Schools provided evidence that it has a process for identifying homeless students and that other non-Title I resources are available to support those students. The LEA did not reserve funds for homeless students in non-Title I buildings in the corporation in 2006-2007.

**20 Percent Choice:** Goshen Community Schools provided evidence of expending funds for Choice-related transportation costs. The LEA was required to reserve an amount up to \$162,594.85 (20% of its 2006-2007 final allocation). The LEA reserved \$22,000.00 and expended \$14,455.00 for Choice expenditures in 2006-2007.

### **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 11**

**1 Percent Parental Involvement:** Goshen Community Schools did not provide evidence of expending the full 1% for parental involvement. The LEA was required to reserve \$8,129.74 of its 2006-2007 allocation for parental involvement activities. The LEA actually set aside \$10,400.00 and expended \$7,692.53.

**Required Action:** Goshen Community School must submit an amendment for the 2007-2008 school year and build \$437.21 into the budget for parental involvement.

Additionally, the annual expenditure report (specifically, Part II) must be updated to reflect these unexpended funds as parental involvement carryover. The report and amendment must be submitted to IDOE within 30 business days of the date of this letter.

**10 Percent Professional Development for School Improvement:** Goshen Community Schools did not provide evidence of expending the full 10% for professional development for school improvement. Schools were required to reserve \$21,726.70 of their 2006-2007 allocation for school improvement. Schools actually set aside \$24,375.00 and expended \$15,507.24.

**Required Action:** Goshen Community Schools must submit an amendment for the 2007-2008 school year and build \$6219.46 of unexpended carryover into Chandler Elementary School's budget for professional development.



The amendment must be submitted to IDOE within 30 business days of the date of this letter.

## **Monitoring Topic 12: Compliance with Supplement, not Supplant**

### **Background**

IDOE interviewed the Title I Program Administrator, the Assistant Superintendent, and the Treasurer regarding the Title I supplement, not supplant requirements. Fiscal documents were reviewed during the onsite visit.

*Statutory Requirement: Section 1120A requires Title I funds to supplement, not supplant non-Federal sources of funds.*

### **Area of Compliance**

**Targeted Assistance School (TAS) Program Expenditures:** Goshen Community Schools provided evidence that in school year 2006-2007, Title I funds were used for expenditures related to the implementation of the Title I program.

### **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 12**

**LEA Guidance on Supplement, Not Supplant:** Goshen Community Schools did not provide evidence of specific guidance regarding Supplement, Not Supplant regulations.

**Required Action:** Goshen Community Schools must ensure that guidance is provided to Title I schools on the Supplement, Not Supplant issue. An explanation or documentation must be provided to IDOE within 30 business days of the date of this letter.

## **Monitoring Topic 13: Compliance with Financial Management/Procurement Requirements**

### **Background**

IDOE interviewed the Title I Program Administrator, the Assistant Superintendent, and the Treasurer regarding the financial management system.

*Regulatory Requirement: Section 80.20 (b)-(i) of the Education Department General Administrative Regulations (EDGAR) details the threshold requirements financial management systems for non-State grantees (such as school districts). (See Attachment G)*

### **Areas of Compliance**

**Purchase Orders and Invoices:** Goshen Community Schools provided evidence that expenditures were properly coded to Title I in 2006-2007.

**Process for Internal Control:** Goshen Community Schools provided evidence that a process for internal control is in place for Title I expenditures.

**Audit Findings:** Goshen Community Schools did not have any audit findings from Indiana State Board of Accounts.

**Expenditures are Reasonable, Allocable, and Necessary:** Goshen Community Schools provided evidence that all 2006-2007 purchases met the requirements for reasonable, allocable, and necessary.

### **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 13**

**Salaries and Benefits:** Goshen Community Schools did not provide evidence that salaries and benefits matched approved staff in 2006-2007. Specifically, the payroll roster for Chandler Elementary did not match the approved application.

**Required Action:** Goshen Community Schools must ensure that staff funded through the Title I grant are approved in either the grant application or an amendment prior to being hired.

### **Monitoring Topic 14: Compliance with Compensation for Personnel Services Requirements**

#### **Background**

IDOE interviewed the Title I Program Administrator and the Assistant Superintendent regarding compensation for personnel services requirements.

*Circular Requirement: OMB Circular A-87, Attachment B, Section 8 details the requirements for all compensation for personnel services supported with federal funds. This section includes the time distribution and semi-annual certification requirements.*

### **Areas of Compliance**

**Compensation for Personnel Services Requirements (Semi-annual Certification and Program Activity Reports):** Goshen Community Schools provided evidence that

it was in compliance with the requirements of OMB Circular A-87, Attachment B, Section 8.

#### **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 14**

None.

### **Monitoring Topic 15: Compliance with Complaint Procedures**

#### **Background**

IDOE interviewed the Title I Program Administrator regarding the complaint process.

#### **Areas of Compliance**

**Complaint Process:** Goshen Community Schools provided evidence that the district has a complaint procedure. No complaints have been filed.

#### **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 15**

None.

### **Monitoring Topic 16: Compliance with Equipment and Technology Requirements (OMB A-87 and EDGAR 80.36)**

#### **Background**

IDOE interviewed the Title I Program Administrator, the Assistant Superintendent, and two Title I building principals regarding equipment acquired with Title I, Part A funds.

*Regulatory Requirement: Section 80.36 of the Education Department General Administrative Regulations (EDGAR) details the threshold requirements for the use, management and disposition of equipment acquired with federal funds by non-State grantees (such as school districts). (See Attachment J)*

#### **Areas of Compliance**

**Disposition of Equipment:** Goshen Community Schools provided evidence that there was a policy regarding the disposition of equipment.

### **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 16**

**Inventory List:** Goshen Community Schools provided a list of books (which are no longer considered to be equipment under new Indiana State Board of Account guidelines), but did not include all required components of an inventory list.

**Required Action:** Goshen Community Schools must ensure that future equipment purchases will be recorded on an inventory list that contains all required components.

### **Monitoring Topic 17: Compliance with Neglected Institutions Funded through Title I, Part A**

#### **Background**

Goshen Community Schools does not have any neglected institutions funded through Title I, Part A.